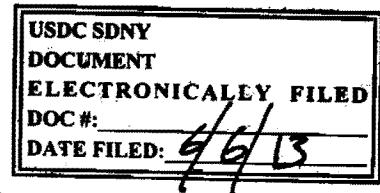


**MEMO ENDORSED**  
**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

----- x  
CHEVRON CORPORATION, :  
: v.  
Plaintiff, :  
: 11 Civ. 0691 (LAK)  
: v.  
: STEVEN DONZIGER, *et al.*,  
: Defendants.  
:----- x



**PLAINTIFF CHEVRON CORPORATION'S MOTION TO  
COMPEL CONSTANTINE CANNON LLP AND BROWNSTEIN  
HYATT FARBER SCHRECK, LLP TO PRODUCE DOCUMENTS**

GIBSON, DUNN & CRUTCHER LLP  
200 Park Avenue  
New York, New York 10166-0193  
Telephone: 212.351.4000  
Facsimile: 212.351.4035  
*Attorneys for Plaintiff Chevron Corporation*

Memorandum Endorsement

Chevron Corp. v. Donziger, 11 Civ. 0691 (LAK)

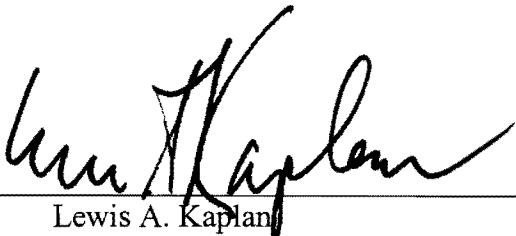
Chevron served subpoenas in this action on two law firms that briefly represented the Lago Agrio Plaintiffs (“LAPs”) in discovery proceedings pursuant to 28 U.S.C. § 1782 (the “Firms”). The Firms took the position that the subpoenaed documents might be subject to attorney-client privilege and work product objections by their former clients, the LAPs, and stated that they would not produce absent a court order although they produced privileged logs. Chevron then brought this motion to compel production. The LAPs, but not the Firms, opposed the motion, asserting privilege and work product.

At the Court’s suggestion, the parties entered into a stipulation pursuant to which those of the Firms’ subpoenaed documents as to which there remained unresolved privilege and work product claims would be produced to Chevron pursuant to Fed. R. Evid. 502(d) and could be designated as Confidential pursuant to the protective order in this case. The stipulation further provided that Chevron is free to use any of the documents for any purpose in this action. DI 1163.

In the circumstances, this motion to compel the Firms to produce the subpoenaed documents is moot. The Clerk shall terminate the motion.

SO ORDERED.

Dated: June 6, 2013



\_\_\_\_\_  
Lewis A. Kaplan  
United States District Judge